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August 1, 1997

Dr. C.W. Jameson
National Toxicology Program
Report on Carcinogens
MD WC-05
P.O. Box 12233
Research Triangle Park, NC 27709

Dear Dr. Jameson:

Your program has invited comments concerning the delisting of saccharin from the NTP's Biennial Report on Carcinogens. I am writing to express my view that saccharin is **not** a human carcinogen.

Saccharin is a substance that has been widely studied by all of the traditional epidemiologic methods, including case-control, cohort, and ecologic correlation studies. The wide variety of study designs and the diversity of populations studied make it highly unlikely that any important cancer effect could have been missed. In fact, the evidence is now so persuasive (against human carcinogenesis) that epidemiologists have ceased to be interested in the issue and no longer consider saccharin to be an important variable in design of contemporary epidemiologic studies of cancer. The toxicologists have also provided us with the explanation for the differences in rat and human experience with saccharin and bladder cancer.

My view of the topic is summarized in the meta-analysis paper we published in 1993, and attach here as an Exhibit. My opinion has not changed since that publication.

Should any of the review bodies wish me to elaborate on my views, I would be pleased to discuss the matter further. Thank you for your kind attention to my comments.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R. Morgan", with a stylized flourish at the end.

Robert W. Morgan, M.D., S.M. Hyg., F.A.C.P.M.

Enclosure

The following journal article was attached to Robert Morgan's comments. Due to copyright infringement laws we cannot display it. We have listed the citation for your information.

National Toxicology Program
Report on Carcinogens Group

Elcock M, Morgan RW. 1993. Update on artificial sweeteners and bladder cancer. *Regulatory Toxicology and Pharmacology* 17:35-43.